

**Annual 47 C.F.R. 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009 (e) CPNI Certification for 2009

Date filed: 02/26/09

Name of Company(s) covered by this certification: Client Instant Access, LLC.

Form 499 Filer ID: 827554

Name of signatory: Richard Lamme

Title of signatory: CEO

I, Richard Lamme, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceeding instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or authorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosures to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed 



**Client Instant Access, LLC**  
**6 Kingsbridge Road**  
**Fairfield, New Jersey 07004**

February 27, 2009

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

RE: EB Docket-06-36  
Annual Certification and Statement for 2009

Dear Ms. Dortch:

Client Instant Access submits the Annual Certification and accompanying statement for 2009 as required by 47 C.F.R. § 64.2009(e).

If you have any questions, please contact me at 973-439-0088.

Thank you,

A handwritten signature in cursive script, reading 'Richard Lamme', is written over a horizontal line.

Richard Lamme  
CEO

## ATTACHMENT A

### Client Instant Access CPNI Procedure Summary

Client Instant Access exclusively provides audio bridge conferencing services to requesting customers. CIA has established policies and procedures that are designed to ensure that it is in compliance with the Federal Communications Commission's ("Commission") rules regarding the use, disclosure, and access to CPNI. CIA provides this statement summarizing those procedures in accordance with section 64.2009(e) of the Commission's rules, 47 C.F.R. § 62.209(e).

CPNI Certification has appointed Richard Lammé who is responsible for overseeing the company's compliance with the FCC's CPNI rules. The officer will ensure that the company files the annual CPNI certification.

Permissible Uses of CPNI: CIA is committed to protecting its customers' privacy, and it limits the situations in which CPNI may be used, access, and/or disclosed. In accordance with the Commission's rules CIA may use CPNI for the following purposes: (1) to initiate, provide, render, and bill and collect for the telecommunications services from which such information is derived; (2) to provide the services necessary to, or used in, the provision of the services that CIA provides to its customer; (3) to market services to customers within the category of service to which the customer already subscribes; and (4) to protect our rights and property, or to protect our customers and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, our services. We also may use CPNI to provide and inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if the customer initiated the call and approves of the use of such information to provide services.

CIA has implemented protections, such as contractual protections, to protect against unauthorized disclosure or access to CPNI in the limited instances where it is required to share or disclose CPNI with third parties, such as for billing and collection.

Employee Training: CIA trains its personnel regarding when they are and are not permitted to use, disclose, and/or permit access to CPNI. CIA has an express disciplinary process in place for the misuse of CPNI, which includes the potential for termination.

Customer Access to CPNI: CIA does not disclose call detail information over the phone during an in-bound call. CIA has implemented protections for online customer account access.

Use of CPNI for Marketing Purposes: CIA currently does not use CPNI to market outside of the category of service to which the customer subscribes. If CIA subsequently determines that it wants to use CPNI for marketing purposes, then it will provide the appropriate customer notification. CIA also will maintain a list of customers that wish/do not wish to receive marketing communications from the company, and will track its

campaigns in accordance with the FCC's rules. CIA currently does not share CPNI with joint venture partners or independent contractors for marketing purposes.

CPNI Safeguards; CIA has instituted procedures to safeguard CPNI. Among other procedures, CIA has implemented procedures to authenticate its customers during and incoming telephone call. CIA also has implemented password protection for online accounts, and has procedures in place for lost or stolen passwords.

CIA has implemented network security measures, including, but not limited to, the use of encryption.

CIA has implemented procedures for notifying customers of certain account changes, including changes in online passwords, changes to online accounts, changes to a backup means of authentication, and changes to the address of record.

Data Breaches; CIA will notify law enforcement within seven day of the reasonable discovery of a data breach involving CPNI. CIA also will notify affected customers as permitted to do so by law. CIA will maintain a record of such notifications in accordance with applicable law.

CIA also is mindful of attempts by pretexters to gain access to CPNI, and will report on any such attempts/methods that pretexters are using when it files its annual CPNI certification.

Customer Complaints; CIA tracks customer complaints it receives regarding CPNI. CIA will report on those complaints in it annual CPNI certification.